Remarks

Claims 1-31 are currently pending. Claims 1-31 have been rejected under 35 USC §103(a). Claims 1, 2, 9, 13, 17, 19, 21 and 25 have been amended. No new matter has been added. No new claims have been added. Applicants assert that all claims are in condition for allowance as set forth more fully below.

103 Rejections

Claims 1-31 stand rejected under 35 USC §103(a) as being unpatentable over Andrews (U.S. Publication No. 2002/0077998 A1) in view of Hickman (U.S. Pat. 6,609,090), in the case of claim 7 in further view of Seestrom (U.S. Publication 2002/0147731) and for claims 8, 27-29 in further view of Okura (U.S. Pat. 5,829,003). Applicants respectfully traverse these rejections.

Claims 1-6, 9-26 and 30-31

The Office Action rejects claims 1-6, 9-26 and 30-31 as being unpatentable under Andrews in view of Hickman. The Office Action concedes on page 3 that Andrews does not teach copying an existing data entry from the existing database location to create a particular previous data entry in a historical database location and then associating the previous data entry stored in the historical database location with the associated data entry. The Applicant concurs with the Office Action's conclusions.

However, it is also true that Hickman offers no implied teaching, suggestion or motivation to copy an existing data entry from the existing database location to create a previous data entry in a historical database location and associating the previous data entry stored in the historical database location with the associated data entry. A reference must provide an explicit or implicit suggestion, teaching or motivation in order to be §103 prior art. (See, *In Re Dembiczak,* 175 F.3d 994, 50 U.S.P.Q2D (BNA) 1614 (Fed. Cir. 1999) (Placing a pumpkin face on an orange trash bag not obvious under 35USC§103 without finding of suggestion, teaching or motivation in the reference). Furthermore, an argument based on the theory that "it was obvious to try" fails as an obviousness rejection. *In re Fine,* 837 F.2d 1071, U.S.P.Q.2D 1596 (Fed. Cir 1988).

<u>Claims 1-6 and 9-12</u>

The Office Action equates Hickman's Master Database I to the "current" database recited in amended independent claim 1. Hickman teaches the use of a "historical database" to archive the current database as a mere back up file (Col. 5, l. 35-60) where the database is copied *en masse*. Before updating the current database, Hickman archives the entire current database to a "historical" database after which the current database is then updated (Col. 5, l. 52-60). At the end of the process the current database contains all the information that the historical database contains with the addition of the latest information update.

Hickman does not teach a method for maintaining and using a personnel directory comprising the steps of receiving a request to edit an existing data entry of the personnel directory, wherein the existing data entry is a portion of the current database and is stored in a current database location, in response to receiving the request to edit the existing data entry, copying exclusively the existing data entry from the current database location to create a previous data entry in a historical database location wherein the previous data entry is distinct from the existing data entry and wherein further the historical database location and the current database location are in separate databases which contain mutually exclusive information, editing the existing data entry stored in the current database location to produce an associated data entry, associating the previous data entry stored in the historical database location with one or more associated data entries, wherein the association includes entering an explanation of the association, wherein further the one or more associated data entries resides in either database as recited in amended independent claim 1.

Hickman teaches the *en masse* archiving of the existing database to an historical database solely to ensure data integrity where the historical database contains essentially the same data contained in the current database. Hickman does not teach the data entry by data entry transfer of information to a historical database exclusively in response to individual requests to edit specific data entries nor does it teach that the existing and historical databases contain mutually exclusive sets of information at the end of the process. Applicant asserts that since Hickman teaches an *en masse* database backup to protect data integrity, Hickman actually teaches away from the recitations of amended

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claim 1. Furthermore, Hickman fails to disclose searching both the current and the historical database locations in response to a query for information.

Claims 2-6 that have been rejected under 35 USC §103(a) depend from allowable independent claim 1 and are allowable over the cited references for at least the same reasons.

Claims 13 – 18

The Office Action equates Hickman's Master Database I to the "current" database recited in amended independent claim 13. Hickman teaches the use of a "historical database" to archive the existing database as a mere back up file (Col. 5, l. 35-60) where the database is copied in masse. Before updating, Hickman archives the entire current database to the "historical" database after which the current database is then updated (Col. 5, l. 52-60). At the end of the process the current database has all the information that the historical database has with the addition of the latest update.

Hickman does not teach a system for maintaining a personnel directory comprising … a historical database in communication with the personnel directory application, wherein the personnel directory application is adapted to receive a request to edit a data entry of the current database location, to copy the data entry of the current database location into the historical database location in response to receiving the request, to edit the data entry of the current database location into an edited data entry, and to associate the edited data entry of the current database location with the copied data entry of the historical database location to establish associations between one or more up-to-date data entries of the current database location and one or more outdated data entries of the historical database location, wherein further the up-to-date entries data in the current database and the outdated data entries in the historical database location are mutually exclusive sets of data entries as recited in amended independent claim 13.

Since Hickman teaches the *en masse* archiving of the existing database to an historical database solely to maintain data integrity after which the archive contains essentially the same data contained in the current database and Hickman does not teach associating specific data entries from the current database and the historical database, Applicant asserts that Hickman actually teaches away from the recitations of claim 13 as

well.

Claims 14-18 that have been rejected under 35 USC §103(a) depend from allowable independent claim 13 and are allowable over the cited references for at least the same reasons.

Claims 19-20

The Office Action appears to equate Hickman's Master Database I to the "current" database as recited in amended independent claim 19. Hickman teaches the use of a "historical database" to archive the existing database as a mere back up file (Col. 5, l. 35-60) where the database is copied *en masse*. Before updating, Hickman archives the entire current database to the "historical" database after which the current database is then updated (Col. 5, l. 52-60). At the end of the process the current database has all the information that the historical database has with the addition of the latest update. In addition, there appears to be no association between data entries in the current database and data entries in the historical database back up.

Hickman does not teach a personnel directory application ...adapted to store a plurality of current data entries in a current database,...adapted to store a plurality of outdated data entries in a historical database, wherein the current and historical databases contain data entries that are mutually exclusive, and ... , wherein the personnel directory establishes associations between the current data entries in the current database and the outdated data entries in the historical database, and wherein the graphical user interface, in response to the search query, presents the desired outdated data entry from the historical database and its associated current data entry from the current database including a reason for the association, wherein the current and outdated data entries are marked accordingly as recited in amended independent claim 19.

Since Hickman teaches the *en masse* archiving of the existing database to an historical database solely to maintain data integrity, the historical database contains essentially the same data contained in the current database. Hickman does not teach associating specific data entries from the current database and the historical database. As such, Applicant asserts that Hickman actually teaches away from the recitations of claim 19 as well. Furthermore, Hickman does not teach the searching of both the current and

historical databases upon receipt pf a search query, which would be impossible with an isolated historical back up database created to maintain data integrity.

Claim 20 has been rejected under 35 USC §103(a) depends from allowable independent claim 19 and is allowable over the cited references for at least the same reasons.

Claims 21-24

The Office Action appears to equate Hickman's Master Database I to the "current" database as recited in amended independent claim 21. Hickman teaches the use of a "historical database" to archive the existing database as a mere back up file (Col. 5, l. 35-60) where the database is copied *en masse*. Before updating, Hickman archives the entire current database to the "historical" database after which the current database is then updated (Col. 5, l. 52-60). At the end of the process the current database has all the information that the historical database has with the addition of the latest update. In addition, there appears to be no association between data entries in the current database and data entries in the historical database back up.

Hickman does not teach a method for maintaining a personnel directory of an organization comprising the steps of copying particular existing data entry at a current database location maintaining a plurality of data entries of the personnel directory into a copied data entry at a historical database location, editing the existing data entry to create a new data entry that is stored in the current database location, wherein the current database and the historical database are then mutually exclusive databases wherein further information in the historical database does not exist in the current database and vice versa, associating the new data entry at the current database location with at least the copied data entry at the historical database location, wherein the association includes entering an explanation of the association,   receiving a search query for the copied data entry at the historical database location; and reporting the copied data entry from the historical database location and the associated new data entry from the current database location, wherein the copied data entry is marked as such as recited in amended independent claim 21.

Since Hickman teaches the *en masse* archiving of the existing database to an historical database solely to maintain data integrity after which the archive contains essentially the same data contained in the current database and Hickman does not teach

associating data entries from the current database and the historical database, Applicant asserts that Hickman also teaches away from the recitations of claim 21 as well. Furthermore, Hickman does not teach the searching of both the current and historical databases upon receipt of a search query.

Claims 22-24 that have been rejected under 35 USC §103(a) depend from allowable independent claim 21 and are allowable over the cited references for at least the same reasons.

Claims 25-31

The Office Action appears to equate Hickman's Master Database I to the "current" database as recited in amended independent claim 21. Hickman teaches the use of a "historical database" to archive the existing database as a mere back up file (Col. 5, l. 35-60) where the database is copied *en masse*. Before updating, Hickman archives the entire current database to the "historical" database after which the current database is then updated (Col. 5, l. 52-60). At the end of the process the current database has all the information that the historical database has with the addition of the latest update. In addition, there appears to be no association between data entries in the current database and data entries in the historical database back up.

Hickman does not teach a method for maintaining a personnel directory of an organization comprising the steps of copying a particular existing data entry at a current database location maintaining a plurality of data entries of the personnel directory into a copied data entry at a historical database location maintaining a plurality of data entries, deleting the existing data entry from the current database location, determining a replacement data entry for the current database location, associating the copied data entry at the historical database location with the replacement data entry at the current database location and any other related data entries residing in either database, wherein information in the historical database does not exist in the current database and vice versa, receiving a search query for the copied data entry at the historical database location, and reporting the copied data entry from the historical database location, wherein the associated replacement data entry and any other associated data entries wherein the copied data entry is marked as such recited in amended independent claim

25.

Since Hickman teaches the *en masse* archiving of the existing database to an historical database solely to maintain data integrity after which the historical database contains essentially the same data contained in the current database and Hickman does not teach associating data entries from the current database and the historical database, Applicant asserts that Hickman also teaches away from the recitations of claim 25 as well. Furthermore, Hickman does not teach the searching of both the current and historical databases upon receipt pf a search query.

Claims 26-31 that have been rejected under 35 USC §103(a) depend from allowable independent claim 25 and are allowable over the cited references for at least the same reasons.

Claims 7, 8, 27-29

The Office Action rejects claim 7 as being unpatentable under Andrews in view of Hickman also in view of Seestrom. However, as mentioned above in discussing Amended independent claim 1, the combination of Andrews and Hickman fails to disclose all of its claimed elements. Claim 7 depends from allowable claim 1 and is therefore allowable for at least the same reasons.

The Office Action rejects claims 8 and 27-29 as being unpatentable under Andrews in view of Hickman also in view of Okura. However, as mentioned above in discussing Amended independent claims 1 and 13, the combination of Andrews and Hickman fails to disclose all of their claimed elements. Claim 8 depends from allowable claim 1 and claims 27-29 depend from allowable claim 25 and therefore are allowable for at least the same reasons.
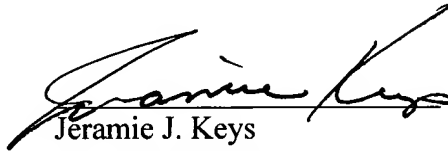
Conclusion

Applicants assert that the application including claims 1-31 is now in condition for allowance. Applicants request reconsideration in view of the amendments and remarks above and further request that a Notice of Allowability be provided. Should the Examiner have any questions, please contact the undersigned.

No fees are believed due. However, please charge any additional fees or credit any overpayment to Deposit Account No. 50-3025.

Respectfully submitted,

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